

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA
CLARKSBURG**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**Criminal Action No. 1:17-CR-51
(KEELEY)**

JAMES L. LAURITA, JR.,

Defendant.

UNITED STATES' UNOPPOSED MOTION FOR PROTECTIVE ORDER

Now comes the United States of America and Betsy Steinfeld Jividen, Acting United States Attorney for the Northern District of West Virginia, by Jarod J. Douglas, Assistant United States Attorney for said District, and pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure and Rule 16.09 of the Local Rules of Criminal Procedure, move the Court to enter a protective order restricting access of the discovery to counsel for the defendant and the defendant. The following is stated in support of this motion.

1. Many of the discovery documents and items contain or include sensitive and personal identifying information about various individuals. Because the discovery documents are voluminous, the expense of time and other resources to redact such information is not a guarantee that such information will not remain due to human error, or otherwise. Accordingly, the United States has legitimate concerns about releasing sensitive personal information without adequate protections in place.

2. In addition, the discovery includes confidential submissions to the Federal Election Commission. Because the discovery documents are voluminous, the expense of time and other resources to redact such information is not a guarantee that such information will not remain due

to human error, or otherwise. Accordingly, the United States has legitimate concerns about releasing confidential Federal Election Commission documents without adequate protections in place.

3. The undersigned has discussed these concerns with counsel for the defendant. As a result of these discussions, the parties have agreed to propose the attached protective order in lieu of redactions. See Exhibit No. 1, Proposed Protective Order.

WHEREFORE, the United States requests that the Court enter the attached protective order.

Respectfully submitted,

BETSY STEINFELD JIVIDEN
ACTING UNITED STATES ATTORNEY

By: /s/ Jarod J. Douglas
Jarod J. Douglas
Assistant U. S. Attorney

CERTIFICATE OF SERVICE

I, Jarod J. Douglas, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that on the 29th day of September 2017, the foregoing UNITED STATES' UNOPPOSED MOTION FOR PROTECTIVE ORDER, including Exhibit No. 1, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

John A. Carr, Esq.
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BETSY STEINFELD JIVIDEN
ACTING UNITED STATES ATTORNEY

By: /s/ Jarod J. Douglas
Jarod J. Douglas
Assistant U. S. Attorney